

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SAMUEL & STEIN

David Stein (DS 2119)
Michael Samuel (MS 7997)
38 West 32nd Street
Suite 1110
New York, New York 10001
(212) 563-9884

Attorneys for Plaintiff, Individually
and on behalf of all others similarly
situated

Alison Rivera, on behalf of
herself and all other persons
similarly situated,

Plaintiff,

- vs. -

Consolidated Bus Transit,
Inc., Clarendon Holding Co.,
Inc., Clarendon Holdings of
NY, Inc., Dana Mancuso, Jodi
Genovese, and Anne Curcio.

Defendants.

INDEX NO. 11-CV-924
(ENV) (VVP)

NOTICE OF MOTION

**NOTICE OF PLAINTIFF'S MOTION TO CONDITIONALLY CERTIFY A FAIR
LABOR STANDARDS ACT COLLECTIVE ACTION AND AUTHORIZE
NOTICE TO BE ISSUED TO ALL PERSONS SIMILARLY SITUATED**

PLEASE TAKE NOTICE, that upon the following memorandum of law, the declaration of David Stein, Esq. the accompanying declaration of Alison Rivera, and all pleadings and supporting materials filed herein, Plaintiff hereby moves this Court for an order conditionally certifying a Fair Labor Standards Act ("FLSA") collective action and authorizing notice to be issued to all persons similarly situated so that they may be informed of the action and have a meaningful opportunity to "opt-in" to the action as plaintiff by also asserting FLSA claims.

Also enclosed is a proposed form of Order on this motion.

Dated: May 13, 2011

A handwritten signature in black ink, appearing to read "David Stein". The signature is fluid and cursive, with the first name "David" and last name "Stein" clearly distinguishable.

David Stein (DS 2119)
SAMUEL & STEIN
38 W. 32nd St., Ste. 1110
New York, New York 10001
(212) 563-9884

Attorneys for Plaintiff